

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
BIG LOTS, INC., <i>et al.</i> , <sup>1</sup>	Case No. 24-11967 (JKS)
Debtors.	(Jointly Administered)
	Related to Docket Nos. 1437 and 1504

**JOINDER OF RESPAWN TO META PLATFORMS, INC. LIMITED OBJECTION TO  
MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) APPROVING SALE OF  
DEBTORS' ASSETS FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND  
ENCUMBRANCES, (II) AUTHORIZING THE DEBTORS TO ENTER INTO AND  
PERFORM UNDER THE GBRP APA, (III) AUTHORIZING ASSUMPTION AND  
ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND  
(IV) GRANTING RELATED RELIEF**

RESPAWN, LLC (“RESPAWN”), by and through its undersigned counsel, hereby responds to and joins in *Meta Platforms, Inc. Limited Objection to Motion of Debtors for Entry of an Order (I) Approving Sale of Debtors’ Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (II) Authorizing the Debtors to Enter Into and Perform Under the GBRP APA, (III) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief* [Docket No. 1504] (the “*Meta Objection*”), and respectfully states as follows:

1. RESPAWN is a manufacturer of gaming furniture and accessories. Upon request of the Debtors through submissions of orders, RESPAWN provided the Debtors with gaming

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

furniture and accessories (the “*Inventory*”) for resale by the Debtors in their retail stores, both prior to and after the Petition Date.<sup>2</sup>

2. The Inventory provided to the Debtors post-petition by RESPAWN has either been sold during the course of these cases, or is in the Debtors’ stores or warehouses to be sold. RESPAWN has not been paid anything on account of the Inventory supplied to the Debtors at the Debtors’ request. RESPAWN is owed \$182,520.00 and will be filing a *Motion for Allowance and Payment of Chapter 11 Administrative Expense Claim*.

3. RESPAWN hereby joins in the Meta Objection and incorporates the Meta Objection as if fully set forth herein. RESPAWN reserves all rights to amend, modify and/or supplement this Joinder.

**WHEREFORE**, RESPAWN respectfully requests that the Court grant the relief requested in the Meta Objection, and grant such other and further relief as is just and proper.

Respectfully Submitted,

Dated: December 31, 2024

GOLDSTEIN & MCCLINTOCK LLLP

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<sup>2</sup> RESPAWN filed a proof of claim [Claim No. 1869 on the claims register] for \$18,252.00 for goods sold prior to the Petition Date.